

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION FOR THE ENTRY OF AN ORDER EXTENDING THE
DEADLINE FOR THE ADE, SCATA and RUNYAN TO RESPOND TO
DWSD’S MOTION FOR ORDER TO SHOW CAUSE AGAINST THE
ASSOCIATION OF DETROIT ENGINEERS, THE SANITARY CHEMISTS
AND TECHNICIANS ASSOCIATION AND JOHN RUNYAN AND
MOTION FOR SANCTIONS AGAINST THE ASSOCIATION OF
MUNICIPAL ENGINEERS AND JOHN RUNYAN FOR VIOLATION OF
THE DISCHARGE INJUNCTION**

The City of Detroit Water & Sewerage Department (“DWSD”) and the Association of Detroit Engineers (“ADE”), the Sanitary Chemists and Technicians Association (“SCATA”) and John Runyan (“Runyan”), through their undersigned counsel, stipulate and agree as follows:

A. On April 19, 2017, the DWSD filed the Motion for Order to Show Cause Against the Association of Municipal Engineers, the Association of Detroit Engineers, the Sanitary Chemists and Technicians Association and John Runyan and Motion for Sanctions Against the Association of Municipal Engineers, the Association of Detroit Engineers, the Sanitary Chemists and Technicians Association and John Runyan for Violation of the Discharge Injunction [Docket No. 11853] (the “Show Cause Motion”).

B. ADE, SCATA and Runyan have withdrawn the Written Exceptions of

Charging Parties to Decision and Recommended Order of Administrative Law Judge on Motion for Summary Disposition, Exhibit F, Show Cause Motion [Docket No. 11853-6], that were the subject of the Show Cause Motion, and ADE, SCATA and Runyan, through their counsel, and DWSD, through its counsel, are working on a consensual resolution of the Show Cause Motion.

C. The parties previously sought and obtained an order approving the extension of the deadline for ADE, SCATA and Runyan to respond to the Show Cause Motion from Monday, May 8, 2017 until and including Friday, May 12, 2017 [Docket No. 11865]. They have resolved this matter, subject to finalizing the documentation that will be filed with this Court and with MERC in accordance with that consensual resolution.

D. ADE, SCATA, Runyan and DWSD therefore respectfully request that the Court enter the attached order extending the deadline for ADE, SCATA and Runyan to respond to the Show Cause Motion from Friday, May 12, 2017 until and including Tuesday, May 16, 2017.

NOW, THEREFORE, the parties stipulate and agree to the entry of the order attached as Exhibit 1, extending the deadline for ADE, SCATA and Runyan to respond to the Show Cause Motion to and including May 16, 2017.

STIPULATED AND AGREED TO ON MAY 12, 2017 BY:

KILPATRICK & ASSOCIATES, P.C.

LAW OFFICES OF BARBARA A.
PATEK, PLC

/s/ Richardo I. Kilpatrick

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/s/ Barbara A. Patek w/consent

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EXHIBIT 1
UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

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Chapter 9

**ORDER GRANTING STIPULATION FOR THE ENTRY OF AN ORDER
EXTENDING THE DEADLINE FOR THE ADE, SCATA and RUNYAN TO
RESPOND TO DWSD’S MOTION FOR ORDER TO SHOW CAUSE
AGAINST THE ASSOCIATION OF DETROIT ENGINEERS, THE
SANITARY CHEMISTS AND TECHNICIANS ASSOCIATION AND JOHN
RUNYAN AND MOTION FOR SANCTIONS AGAINST THE
ASSOCIATION OF MUNICIPAL ENGINEERS AND JOHN RUNYAN FOR
VIOLATION OF THE DISCHARGE INJUNCTION**

The Court has read the Stipulation for the Entry of an Order Extending the Deadline for the Association of Detroit Engineers (“ADE”), the Sanitary Chemists and Technicians Association (“SCATA”) and John Runyan (“Runyan”) to Respond to the Detroit Water & Sewerage’s Show Cause Motion¹ [Doc. # ____] (the “Stipulation”). The Court finds good cause for entry of this Order and is otherwise fully advised in the premises;

¹ As defined in the Stipulation.

IT IS HEREBY ORDERED THAT the deadline for ADE, SCATA and Runyan to respond to the Detroit Water & Sewerage's Show Cause Motion is extended to and including May 16, 2017.